

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

TEHUM CARE SERVICES, INC.,<sup>1</sup>

Debtor.

Chapter 11

Case No. 23-90086 (CML)

Motion For Order Allowing Incarcerated Claimant Appearance At Mediation

Michael Zimmerman (the “PI/WD Trustee”), the trustee for the Tehum Personal Injury Settlement Trust (the “PI/WD Trust”), by and through his undersigned counsel, hereby submits this Motion for an order from this Court to allow incarcerated individuals to appear remotely at an upcoming mediation to take place on December 17, 2025 (the “Motion”).

**PRELIMINARY STATEMENT**

The PI/WD Trustee seeks an Order from the Court allowing two incarcerated individuals to appear remotely at an upcoming mediation to take place on December 17, 2025. The Order is an administrative requirement of the Arizona Department of Corrections, Rehabilitation, and Re-Entry (the “ADOC”). The PI/WD Trustee is not requesting an Order directing the ADOC to take any action, but is instead seeking an Order from this Court that can be presented to the ADOC so that it may allow the requested inmates to remotely (or by telephone) attend the upcoming mediation.

**FACTUAL BACKGROUND**

1. On February 13, 2023, Tehum Care Services, Inc. f/k/a Corizon Health Services (the “Debtor”) filed its voluntary petition for relief under Chapter 11 of the Bankruptcy Code (the

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<sup>1</sup> The last four digits of the Debtor’s federal tax identification number is 8853. The Debtor’s service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.



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“Bankruptcy Case”).

2. On March 3, 2025, the Bankruptcy Court confirmed the *First Modified Joint Chapter 11 Plan of Reorganization of the Tort Claimants’ Committee, Official Committee of Unsecured Creditors, and Debtor* (the “Confirmation Order” or the “Plan”) [ECF No. 2014, Ex. B].

3. On March 31, 2025, the Plan became effective (the “Effective Date”) [ECF No. 2088].

4. Jason Robinson and Mark Stewart are both currently inmates with the ADOC.

5. Jason Robinson (“Mr. Robinson”) elected to opt-out of his right to receive a distribution from the PI/WD Trust and to instead liquidate his claim against Corizon in the tort system in order to recover from Corizon’s insurer(s).

6. Mark Stewart (“Mr. Stewart”) elected to receive a pro-rata distribution from the PI/WD Trust.

7. Pursuant to the Trust Distribution Procedures for the Person Injury Claims, the PI/WD Trustee has the ability to negotiate a settlement of Mr. Stewart’s claim with applicable insurance carriers, and believes that Mr. Stewart’s attendance at the upcoming mediation could enhance the recovery from Mr. Stewart’s claim [ECF No. 1788-3].

### **REQUEST/CONCLUSION**

In order to facilitate the upcoming mediation, the PI/WD Trustee requests that the Court enter an order allowing the Mr. Robison and Mr. Stewart to attend the upcoming mediation on December 17, 2025 as follows:

<b><u>Inmate</u></b>	<b><u>Inmate #</u></b>	<b><u>Prison Facility</u></b>	<b><u>Date/Time</u></b>
Jason Robinson	284001	ASPC – Tucson	Dec. 17 (9:00 am)
Mark Stewart	203381	ASPC – E South Unit	Dec. 17 (9:30 am).

Upon entry of the order, attorney Scott Griffiths, who is counsel for Mr. Robinson and Mr.

Stewart, will provide the ADOC with a signed copy of the order and specific instruction for the mediation (including remote access information and/or a telephone number).

Dated: December 10, 2025

Phoenix, AZ

Respectfully submitted,

**NACH, RODGERS, HILKERT & SANTILLI**

/s/ Stuart B. Rodgers

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COUNSEL FOR THE TEHUM PERSONAL  
INJURY SETTLEMENT TRUST

Approved as to Form and Content:

/s/ Scott Griffiths

Scott Griffiths

Counsel for Jason Robinson and Mark Stewart

**CERTIFICATE OF SERVICE**

I certify that on December 10, 2025, I caused a true and correct copy of the foregoing document to be served by the Court's CM/ECF notification system, which will send notice of electronic filing to all counsel of record.

/s/ Kay Lucas\_\_\_\_\_